

**EXHIBIT F**  
**(Plaintiffs' Rule 26(a)(1) Initial Disclosures)**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

THE SOUTH CAROLINA STATE  
CONFERENCE OF THE NAACP, and

Taiwan Scott, on behalf of himself and all  
other similarly situated persons,

Plaintiffs,

v.

HENRY D. MCMASTER, in his official  
capacity as Governor of South Carolina;  
THOMAS C. ALEXANDER, in his official  
capacity as President of the Senate; LUKE A.  
RANKIN, in his official capacity as  
Chairman of the Senate Judiciary Committee;  
JAMES H. LUCAS, in his official capacity as  
Speaker of the House of Representatives;  
CHRIS MURPHY, in his official capacity as  
Chairman of the House of Representatives  
Judiciary Committee; WALLACE H.  
JORDAN, in his official capacity as  
Chairman of the House of Representatives  
Elections Law Subcommittee; HOWARD  
KNAPP, in his official capacity as interim  
Executive Director of the South Carolina  
State Election Commission; JOHN WELLS,  
Chair, JOANNE DAY, CLIFFORD J.  
EDLER, LINDA MCCALL, and SCOTT  
MOSELEY, in their official capacities as  
members of the South Carolina Election  
Commission,

Defendants.

**Case No. 3-21-cv-03302-JMC-  
TJH-RMG**

**PLAINTIFFS' INITIAL  
DISCLOSURES PURSUANT TO  
FED. R. CIV. P. 26(a)(1) AND  
LOCAL RULE 26.03 (A)(1), (4)**

**THREE-JUDGE PANEL**

**PLAINTIFFS' INITIAL DISCLOSURES UNDER FRCP RULE 26(a)(1)**

Pursuant to Rule 26(a)(1) of the Federal Rule of Civil Procedure, Plaintiffs the South Carolina State Conference of the NAACP (“SC NAACP”) and Taiwan Scott (collectively, “Plaintiffs”) hereby provide the following Initial Disclosures based upon information reasonably available to Plaintiffs at this time. Plaintiffs hereby reserve the right to amend and/or supplement their Initial Disclosures based on new information obtained in discovery or otherwise in the course of this action.

**RESERVATION OF RIGHTS**

These Initial Disclosures are not intended to, and do not, constitute admissions as to the relevance or admissibility of the information disclosed, and are made without any waiver of attorney-client privilege, work product protection, or any other applicable privilege, protection, or immunity.

**A. Individuals**

Based on upon information currently available to Plaintiffs, the following individuals are likely to have discoverable information that Plaintiffs may use to support their claims or defenses, not including information used solely for impeachment.

1. Individuals and subchapters identified as Plaintiffs in this action and individuals and subchapters affiliated with Plaintiffs SC NAACP and Taiwan Scott who have general knowledge or information regarding (i) South Carolina’s redistricting process and the state’s history of redistricting; and (ii) South Carolina’s voting population, including voting patterns and demographics, including, and who may be contacted through Plaintiffs’ undersigned counsel:
  - a. Executive leadership of the South Carolina State Conference of the NAACP, including Brenda Murphy, President; and
  - b. Taiwan Scott.
2. Individuals identified as Defendants in this action, including:

- a. Henry D. McMaster, in his official capacity as Governor of South Carolina;
  - b. Thomas C. Alexander, in his official capacity as Chairman of the Senate Judiciary Committee;
  - c. Luke A. Rankin, in his official capacity as Chairman of the Senate Judiciary Committee;
  - d. Representative James H. Lucas, in his official capacity as Speaker of the South Carolina House of Representatives;
  - e. Chris Murphy, in his official capacity as Chairman of the South Carolina House of Representatives Judiciary Committee;
  - f. Representative Wallace H. Jordon, in his official capacity as Chairman of the South Carolina House of Representatives Elections Law Subcommittee;
  - g. Howard Knapp, in his official capacity as interim Executive Director of the South Carolina State Election Commission;
  - h. John Wells in his official capacity as a member of the South Carolina State Election Commission;
  - i. Joanne Day in her official capacity as a member of the South Carolina State Election Commission;
  - j. Clifford J. Edler in his official capacity as member of the South Carolina State Election Commission;
  - k. Linda McCall in her official capacity as a member of the South Carolina State Election Commission; and
  - l. Scott Moseley in his official capacity as member of the South Carolina State Election Commission.
3. Members of the South Carolina State House of Representatives, 223 Blatt Building, 1105 Pendleton Street, Columbia, SC 29201, who may have information regarding the South Carolina redistricting process and the South Carolina voting population, including, but not limited to:
- a. Representative Justin T. Bamberg;
  - b. Representative Beth E. Bernstein;
  - c. Representative Wendy C. Brawley;

- d. Representative Neal A. Collins;
  - e. Representative Jason Elliot;
  - f. Representative Jerry N. Govan, Jr.;
  - g. Representative John Richard C. King;
  - h. Representative Patricia Moore Henegan; and
  - i. Representative Wm. Weston J. Newton.
4. Staff members for the South Carolina State House of Representatives, including but not limited to, staff members for the Judiciary Committee, Elections Law Subcommittee, and House Redistricting Ad Hoc Committee who may have information regarding: (i) the 2020 South Carolina redistricting process; (ii) South Carolina's history of redistricting; (iii) the district map drawn for the South Carolina State House of Representatives; and (iv) South Carolina's voting population.
5. Third-party organizations focused on redistricting, including their members, employees, and agents, who may have information regarding the redistricting process in South Carolina, including, but not limited to:
- a. Adam Kincaid, Executive Director, the National Republican Redistricting Trust, 1750 Tysons Boulevard, Suite 1500, McLean, VA, 22102, (703) 245-8020;
  - b. Lynn Teague, Vice President for Issues and Action, League of Women Voters of South Carolina, PO Box 845, Columbia, SC 29202, (803) 556-9802; and
  - c. Frank Rainwater, Executive Director, South Carolina Revenue and Fiscal Affairs Office, 100 Assembly Street, Rembert Dennis Building, Suite 421, Columbia, SC 29201, (803) 734-3793.
6. Expert witnesses, who have information regarding the manner in which the House district map was drawn and the voting population within each drawn district, to be identified pursuant to the Court's Scheduling Order regarding expert discovery.
7. Any other witnesses identified by any party in this litigation in initial disclosures or in any other discovery responses.

Plaintiffs reserve the right to seek discovery from, and relating to, other persons that may subsequently become known as persons likely to have discoverable information. Plaintiffs

further reserve the right to modify the foregoing list and to identify and call as witnesses additional persons if, during the course of their investigation and discovery relating to this case, Plaintiffs learn that such additional persons have knowledge or information that Plaintiffs may use to support their claims, defenses, and proposed remedies.

**B. Documents**

Based on information reasonably available, Plaintiffs identify the following documents, electronically stored information, or other tangible things, all of which are maintained by them, are already in possession of the parties, or are publicly available, that Plaintiffs may use to support their claims, defenses, and proposed remedies, unless such use is solely for impeachment:

1. Data and analyses relating to South Carolina's demographics, voter registration, elections, voting patterns, and the 2020 South Carolina redistricting process;
2. Memoranda, minutes, newspaper articles, public statements, legislation introduced, and/or legislative hearing/committee transcripts and/or videos, redistricting criteria, and other documents related to the 2020 South Carolina redistricting process;
3. Public testimony, correspondence, and other documents regarding the 2020 South Carolina redistricting process;
4. Expert and fact witness material, to be identified pursuant to the Court's Scheduling Order regarding expert discovery;
5. SC NAACP organizational mission statement; and
6. All documents disclosed by any Plaintiff, Defendant, or other party in this action.

These Initial Disclosures do not constitute an admission as to the existence, relevance, or admissibility of the identified materials, or a waiver of any attorney-client or work product privilege, or other applicable privilege or immunity.

Plaintiffs continue to search for additional documents, electronically-stored information,

or other tangible things that they may use to support their claims, defenses, and/or proposed remedies, and expressly reserve the right to supplement these Initial Disclosures with such additional documents, electronically-stored information, or other tangible things. In addition to the above-described documents, electronically-stored information, or other tangible things, Plaintiffs may also rely upon other publicly-available documents, electronically-stored information, or other tangible things, and/or electronically stored information, or other tangible things produced by third parties in this or other litigations.

**C. Computation of Damages**

Plaintiffs do not seek damages.

**D. Insurance Agreements**

This component is inapplicable to Plaintiffs.

**E. Local Rule 26.03(A)(1): A Short Statement of the Facts of the Case**

The best statement of the facts of this case, pending discovery in this action, is contained in Plaintiff's Amended Complaint (ECF No. 84).

**F. Local Rule 26.03(A)(4): A Summary of the Claims or Defenses with Statutory and/or Case Citations Support the Same**

The best summary of Plaintiffs' claims with statutory and/or case citations is contained in Plaintiffs' Amended Complaint (ECF No. 84).

Dated: January 7, 2022

Respectfully submitted,

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\* Motion for admission *Pro Hac Vice*  
forthcoming

\*\* Admitted *Pro Hac Vice*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 7, 2022, a true and correct copy of the foregoing was served on all counsel of record by electronic mail.

/s/ Christopher Bryant  
Christopher Bryant